

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCT
MARKETING, SALES
PRACTICES AND PRODUCTS
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-
MAS-RLS**

MDL No. 2738

This Document Relates to All Cases

**PLANTIFFS' RENEWED MOTION FOR LEAVE TO FILE A SECOND
AMENDED MASTER LONG FORM COMPLAINT**

PLEASE TAKE NOTICE that, at 9:00 a.m. on September 18, 2023, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiff's Steering Committee ("PSC"), will move for leave to file a Second Amended Master Long Form Complaint ("Second Amended Master Complaint").

As fully discussed in Plaintiffs' Memorandum of Law in Support of this Motion, Plaintiffs seek to file a Second Amended Master Complaint to add additional facts, Defendants, and causes of action that arose in the process of conducting expert discovery and during the pendency of the LTL Management LLC's multiple bankruptcies while this MDL was stayed. Plaintiffs further ask that all Plaintiffs' short form complaints be deemed to incorporate the Second Amended Master Complaint in its entirety without the need for any Plaintiff to amend her short form complaint.

A clean version of the proposed Second Amended Master Complaint is attached as **Exhibit A**. A redlined version of the proposed Second Amended Master Complaint is also attached as **Exhibit B** for ease of identifying the proposed additions.

Plaintiffs conferred with Defendants pursuant to Local Rule 15.1(a), and Defendants oppose this motion.

Plaintiffs respectfully request that the Court grant leave to file the proposed Second Amended Master Complaint. A proposed order is attached.

Dated: August 14, 2023

Respectfully submitted,

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